

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

**ANTHONY TRUPIA,**

**Plaintiff,**

**v.**

**Case No. CIV-24-498-SLP**

**HERITAGE HARD ASSETS LLC;  
KYLE PATTON, individually as  
Manager/Officer of HERITAGE HARD  
ASSETS LLC; HLV VENTURES, an  
unregistered New York company;  
REAGAN GOLD GROUP, LLC;  
STEVE FRANCIS, individually as  
Manager/Officer of REAGAN GOLD  
GROUP, LLC; WORLD HARVEST  
CHURCH, INC.; ROD PARSLEY,  
individually as Manager/Officer of  
WORLD HARVEST CHURCH, INC.;  
SOUTH BAY GALLERIES LLC;  
BRANDON MENDELSON, individually  
as Manager/Officer of SOUTH BAY  
GALLERIES LLC; TELNYX LLC;  
DAVID CASEM, individually as  
Manager/Officer of TELNYX LLC;  
IAN EITHER, individually as  
Manager/Officer of TELNYX LLC;  
JAMES WHEDBEE, individually as  
Manager/Officer of TELNYX LLC;  
MANDI MENA, individually as  
Manager/Officer of TELNYX LLC;  
ONVOY, LLC; BRETT SCORZA,  
individually as Manager/Officer of  
ONVOY, LLC; JAMES HYNES,  
individually as Manager/Officer of  
ONVOY, LLC; G EDWARDS EVANS,  
individually as Manager/Officer of  
ONVOY, LLC; MATTHEW CARTER  
JR, individually as Manager/Officer of  
ONVOY, LLC; LEVEL 3  
COMMUNICATIONS, LLC; JEFF  
STOREY, individually as**

**Manager/Officer of LEVEL 3  
COMMUNICATIONS, LLC;  
ZEBERSKY PAYNE SHAW LEWENZ,  
a Florida law firm; ZACHARY D  
LUDENS, individually as an attorney of  
ZEBERSKY PAYNE SHAW LEWENZ;  
and DOES 1 through 100, inclusive,**

**Defendants.**

**CERTIFICATE OF COMPLIANCE WITH  
REQUIREMENTS TO GIVE NOTICE OF REMOVAL**

The undersigned, attorneys of record for Defendant, HLV Ventures, certify that, in compliance with 28 U.S.C. §1446(d), a copy of the Notice of Filing Notice of Removal of this action has been filed with the Clerk of the Oklahoma County District Court, State of Oklahoma. A file-stamped copy of the Notice of Filing Notice of Removal is attached hereto as Exhibit "1." The undersigned further certifies that, in compliance with the requirements of 28 U.S.C. §1446(d), written notice of the removal was also forwarded to all parties known to be served in this action, along with a copy of the Notice of Removal filed in this court. This Notice was sent on May 16, 2024, to Plaintiff, Anthony Trupia.

Respectfully submitted,

**HALL, ESTILL, HARDWICK,  
GABLE, GOLDEN & NELSON, P.C.**

*s/Aaron C. Tift*

Mark Banner, OBA # 13243

Aaron C. Tift, OBA # 33288

**HALL, ESTILL, HARDWICK, GABLE,  
GOLDEN & NELSON, P.C.**

521 E. 2<sup>nd</sup> Street, Suite 1200

Telephone (918) 594-0400

Facsimile (918) 594-0505

**ATTORNEYS FOR DEFENDANT,  
HLV VENTURES**

## **CERTIFICATE OF SERVICE**

I hereby certify that on May 21, 2024, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants on the ECF System.

I hereby further certify that on May 21, 2024, a true and correct copy of the foregoing document was served on the following via first class, U.S. Mail:

Anthony Trupia  
605 SE 21<sup>st</sup> St.  
Oklahoma City, OK 73129

**PRO SE PLAINTIFF**

*s/ Aaron C. Tift*

---